

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 2:21-CR-227
Plaintiff,	:	
vs.	:	JUDGE SARGUS
YOUSIF AMIN MUBARAK,	:	
Defendant.	:	

DEFENDANT'S SECOND MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 5.2.1, Defendant Yousif Amin Mubarak respectfully moves this Honorable Court for leave to file the exhibits to his Motion to Suppress under seal. The basis for this request is more fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

/s/Robert J. Cochran
Robert J. Cochran (0055658)
Robert Cochran Law, LLC
52 West Whittier Street
Columbus, OH 43206
P: (614) 445-8416
F: (614) 573-7164
Email: bob@rcochranlaw.com

*Counsel for Defendant Yousif Amin
Mubarak*

MEMORANDUM IN SUPPORT

Mubarak is charged with seven counts of Transmission of a Threat in Interstate Commerce, a violation of 18 U.S.C. §875(c). (ECF Doc. No. 54.) The trial is set for August 21, 2023, and the motion cut-off date is July 7, 2023. This is Mubarak's Second Motion to File Documents Under Seal. His first motion was filed on June 30, 2023, and it seeks leave to file a Motion in *Limine* under seal. (ECF Doc. No. 94.)

In preparation for trial, defense counsel intends to file a Motion to Suppress on or before July 7, 2023. Defense counsel anticipates that the Motion will include exhibits that the government has previously designated as either "Confidential" or "Not for Public Disclosure" under the terms of a Protective Order in this case. (ECF Doc. No. 83.) Accordingly, Mubarak respectfully seeks leave to file the exhibits to his Motion to Suppress under seal in order to comply with the Court's Protective Order.

Respectfully submitted,
/s/Robert J. Cochran
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Robert Cochran Law, LLC
52 West Whittier Street
Columbus, OH 43206
P: (614) 445-8416
F: (614) 573-7164
Email: bob@rcochranlaw.com
Counsel for Defendant Yousif Amin
Mubarak

CERTIFICATE OF SERVICE

I hereby certify that on July 4, 2023, a true copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/Robert J. Cochran
Robert J. Cochran (0055658)